

Agency Response to Department of Planning and Budget's Economic Impact Analysis

18 VAC 41-40 – Wax Technician Regulations
Board for Barbers and Cosmetology

The Board for Barbers and Cosmetology (Board) believes that the curriculum and performances being proposed are not higher than the minimum required to protect public health and safety. The Board, after discussions concerning the curriculum and performances which included the Department of Planning and Budget, adopted as proposed 115 hours and 36 performances.

The Board believes that the instruction and percentage of instruction that the Economic Impact Analysis (EIA) deems as not applicable is too high and inaccurate. Such as the EIA states that salon management and salesmanship are not essential. Section 18 VAC 41-40-190(7) Salon management requires instruction in business ethics and care of equipment which the Board deems necessary. In the proposed curriculum, salesmanship is not included. In Section 18 VAC 41-40-190(4) Client consultation includes instruction in clients health conditions, skin analysis, treatments, client expectations, and health forms and questionnaires which the Board believes is necessary for protection of the citizens.

As of June 30, 2003, over 2000 wax technician licenses have been issued by the Board. The Board adopted the proposed hours and performances to meet the minimum required to protect public health, safety, and welfare.